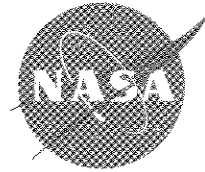


National Aeronautics and Space Administration
Goddard Space Flight Center
Greenbelt, MD 20771



May 9, 2011

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at
Eplore@NASA Goddard Breakfast

On the morning of May 14, 2011, the American Institute for Aeronautics and Astronautics (AIAA) is sponsoring, and NASA Goddard is hosting, a breakfast at NASA Goddard Space Flight Center. The purpose of the breakfast is to kick-off Explore@NASA Goddard, an event open to the public to educate and disseminate information to the public about upcoming Goddard science missions and the wide variety of science and technology being researched and developed at Goddard.

Approximately 150 people are expected to attend the breakfast, representing NASA, local governments, universities, and industry. The estimated cost per person for the breakfast is \$25.

Attendance at the breakfast will allow NASA employees an opportunity to discuss issues of interest to the scientific community, including NASA research and discoveries, with other attendees from local governments, universities, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect AIAA or a majority of its members, including employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge, may accept an invitation for free attendance to the event for themselves and their spouses or guests.

NASA employees whose duties substantially affect AIAA or a majority of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens".

Robert M. Stephens